

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF FAITH E. GAY IN SUPPORT OF NON-PARTY OFFICE OF THE  
GOVERNOR OF THE STATE OF NEW YORK’S OPPOSITION TO META  
DEFENDANTS’ ADMINISTRATIVE MOTION TO COMPEL JOINT LETTER  
BRIEFING BY NY EXECUTIVE AGENCIES**

I, Faith E. Gay, declare and state as follows:

1. I am a partner with the law firm Selendy Gay PLLC. I represent the non-party Office of the Governor of the State of New York in relation to efforts by Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (together, “Meta”) to seek non-party discovery in the above-captioned matter. I submit this declaration pursuant to Civil Local Rule 7-11 in support of the non-party Office of the Governor of the State of New York’s Opposition to Meta Defendants’ Administrative Motion to Compel Joint Letter Briefing by the New York Executive Agencies.

2. Attached as **Exhibit 1** is a compilation of true and correct copies of all 19 document production letters that accompanied the production of documents to Meta authorized by the Office of the Governor of the State of New York, the New York Office of Mental Health, the New York Department of Health, the New York Office of Children and Family Services, and the New York Council on Children and Families.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of legislation duly enacted by the New York State Legislature and signed into law by New York Governor Kathy Hochul, L 2025, ch 55 § 1 part RR.

4. Attached as **Exhibit 3** is a true and correct copy of *People of the State of New York v. TikTok Inc.*, Index No. 452749/2024, Dkt. No. 122 (N.Y. Sup. Ct. N.Y. Cty. May 20, 2025).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 28, 2025

Respectfully submitted,

/s/ Faith E. Gay

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*Attorney for Non-Party Office of the Governor of  
the State of New York*